

**UNITED STATES OF AMERICA
STATE OF ILLINOIS, COUNTY OF MCHENRY
IN THE CIRCUIT COURT OF THE TWENTY SECOND JUDICIAL CIRCUIT**

COMPLAINT*19CF 290*

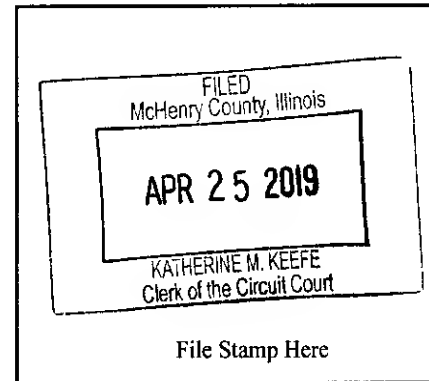
CASE NUMBER

SAO NUMBER

DOCUMENT CONTROL NUMBER

CLPD-19-007922

REPORT NUMBER

CITY, VILLAGE, TOWNSHIP
AND CODE

PEOPLE OF THE STATE OF ILLINOIS OR

A MUNICIPAL CORPORATION

-VS-

Andrew T Freund

DEFENDANT

COUNT ONE

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of _____
First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(1) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body, knowing said acts would cause the death of A.F., thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class M

COUNT TWO

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of _____
First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(2) of the Illinois Compiled Statutes in that said Defendant

without legal justification, forced A.F. (minor child, DOB 10/14/13), to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body, knowing that said acts created a strong probability of death or great bodily harm to A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class M

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINEDBY MLGDATE 4/25/19

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COUNT 3

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing or attempting to commit a forcible felony, Aggravated Battery in violation of Section 12-3.05(b)(1) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class M

COUNT 4

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing or attempting to commit a forcible felony, Aggravated Battery, in violation of Section 12-3.05(b)(2) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class M

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINEDBY AMEDATE 4/25/19

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COUNT 5

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

First Degree Murder

in violation of Chapter 720 Act 5 Section 9-1(a)(3) of the Illinois Compiled Statutes in that said Defendant

without lawful justification, while committing a forcible felony, Aggravated Domestic Battery, in violation of Section 12-3.3(a) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, forced A.F. (minor child, D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing the death of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class M

COUNT 6

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

Aggravated Battery

in violation of Chapter 720 Act 5 Section 12-3.05(b)(1) of the Illinois Compiled Statutes in that said Defendant

in committing a battery, knowingly and without legal justification forced A.F. a minor child under 13 years of age (D.O.B. 10/14/2013) to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body thereby causing great bodily harm in that it caused A.F.'s death.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class X

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED

BY MPGDATE 4/25/19

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COUNT 7

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

Aggravated Domestic Battery

in violation of Chapter 720 Act 5 Section 12-3.3(a) of the Illinois Compiled Statutes in that said Defendant

in committing a domestic battery in violation of Section 12-3.2(a)(1) of Act 5 of Chapter 720 of the Illinois Compiled Statutes, knowingly caused great bodily harm to A.F., (minor child, D.O.B. 10/14/2013), a family member of the defendant, in that said defendant forced A.F. to remain in a cold shower for an extended period of time and/or struck A.F. on or about the body causing A.F.'s death.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class 2

COUNT 8

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois _____ Andrew T Freund _____ hereinafter called the defendant committed the offense of

Aggravated Battery

in violation of Chapter 720 Act 5 Section 12-3.05(b)(2) of the Illinois Compiled Statutes in that said Defendant

in committing a battery, knowingly and without legal justification caused bodily harm to A.F., a minor child under 13 years of age (D.O.B. 10/14/2013) in that he forced A.F. to remain in a cold shower for an extended period of time and/or struck A.F. on or about his body.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class 3

RIGHTS EXPLAINED**BY** MCC**DATE** 4/25/19

(VERIFICATION ON LAST PAGE)

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COUNT 9

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois Andrew T Freund hereinafter called the defendant committed the offense of

Concealment Of Homicidal Death

in violation of Chapter 720 Act 5 Section 9-3.4(a) of the Illinois Compiled Statutes in that said Defendant

knowingly concealed the death of minor child A.F. (D.O.B. 10/14/2013) knowing that A.F. died by homicidal means in that he buried the body of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class 3

COUNT 10

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 15th day of April, 2019 in McHenry County, Illinois Andrew T Freund hereinafter called the defendant committed the offense of

Concealment Of Homicidal Death

in violation of Chapter 720 Act 5 Section 9-3.5(b) of the Illinois Compiled Statutes in that said Defendant

knowingly concealed the death of minor child A.F. (D.O.B. 10/14/2013) in that he buried the body of A.F.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class 4

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINED

BY M26

DATE 4/25/19

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COUNT 11

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 17th day of April, 2019 in McHenry County, Illinois Andrew T Freund hereinafter called the defendant committed the offense of Failure to Report Missing or Child Death in violation of Chapter 720 Act 5 Section 10-10(a) of the Illinois Compiled Statutes in that said Defendant

the parent of A.F., a child under 13 years of age (D.O.B. 10/14/2013), failed to report the death of A.F. to law enforcement officers within 24 hours of death of A.F., when he knew A.F. to be deceased.

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☒ Felony ☐ Misdemeanor Class 4

COUNT

In the name and by the authority of the People of the State of Illinois _____ Detective Eitel _____ hereinafter called the complainant, on oath charges that on or about the 24th day of April, 2019 in McHenry County, Illinois Andrew T Freund hereinafter called the defendant committed the offense of _____ in violation of Chapter _____ Act _____ Section _____ of the Illinois Compiled Statutes in that said Defendant

Contrary to the form of the Statute in such case made and provided and against the peace and dignity of the People of the State of Illinois

☐ Felony ☐ Misdemeanor Class _____

(VERIFICATION ON LAST PAGE)

RIGHTS EXPLAINEDBY MEBDATE 4/25/19

<u>19CF290</u> Case Number SAO Number Document Control Number <u>CLPD-19-007922</u> Report Number	<h2 style="margin: 0;">CRIMINAL COMPLAINT VERIFICATION</h2>	JURISDICTION NAME/CODE
I have read this complaint containing <u>11</u> count/s, and all allegations herein are true and correct.		
NEXT COURT DATE/TIME: _____		
 Detective Eitel Complainant		
Subscribed and sworn before me this this <u>24</u> day of <u>APRIL 2019</u>		
Court Location: _____	 JUDGE / CIRCUIT COURT CLERK / NOTARY PUBLIC DEPUTY OF THE CIRCUIT CLERK	
A/O _____ Badge Number _____		
Copy of Complaint delivered to said Defendant, rights explained and Probable Cause found (if warrantless arrest)		
TOTAL BOND \$ _____		
this <u>25th</u> day of <u>April 2019</u>		
 JUDGE		
DEFENDANT INFORMATION:		
<u>Freund</u> DEFENDANT'S NAME - LAST	<u>T</u> MIDDLE	<u>Andrew</u> FIRST
<u>94 Dole Ave</u> DEFENDANT'S ADDRESS	<u>Crystal Lake</u> CITY	<u>IL 60014</u> STATE ZIP CODE
<u>12/19/1958</u> DATE OF BIRTH	<u>F65301858360</u> DRIVER'S LICENSE	<u>IL</u> STATE
WARANTLESS ARREST <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Sex <u> </u> M Race <u> </u> W		
DATE / TIME OF ARREST <u>4/24/2019</u>		
Co-Defendant(s): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Attach or identify to clerk)		

RIGHTS EXPLAINED

 BY me

 DATE 4/25/19